

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

<b>TERRI PECHNER-JAMES and SONIA</b>	)	
<b>FERNANDEZ,</b>	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>C.A. No. 03-12499-MLW</b>
	)	
<b>CITY OF REVERE, THOMAS AMBROSINO,</b>	)	
<b>MAYOR, CITY OF REVERE POLICE</b>	)	
<b>DEPARTMENT, TERRENCE REARDON,</b>	)	
<b>CHIEF OF POLICE, BERNARD FOSTER,</b>	)	
<b>SALVATORE SANTORO, ROY COLANNINO,</b>	)	
<b>FREDERICK ROLAND, THOMAS DOHERTY,</b>	)	
<b>JOHN NELSON, JAMES RUSSO, MICHAEL</b>	)	
<b>MURPHY and STEVEN FORD,</b>	)	
<b>Defendants,</b>	)	
	)	

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**DEFENDANT, CITY OF REVERE'S, SUPPLEMENTAL FILING IN  
SUPPORT OF ITS MOTION FOR DISCOVERY SANCTIONS**

Now comes Defendant, City of Revere, and hereby submits its supplemental filing in support of its motion for discovery sanctions pursuant to the Order of the Court entered on January 25, 2006 (See Docket, Electronic Clerk's Notes, 1/25/06).

**Supplemental Filing**

Attached hereto as Exhibit "A" are the annotated interrogatory responses of Plaintiff, Sonia Fernandez, reflecting those interrogatory responses for which a dispute still exists notwithstanding Plaintiff's supplemental response.

Attached hereto as Exhibit "B" are the annotated interrogatory responses of Plaintiff, Terri Pechner-James, reflecting those interrogatory responses for which a dispute still exists notwithstanding Plaintiff's supplemental response.

For the Defendant, City of Revere,  
By its Attorney,

/s/ Walter H. Porr, Jr.  
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Assistant City Solicitor  
BBO#: 659462  
City Hall, 281 Broadway  
Revere, MA 02151  
781-286-8166

Dated: January 26, 2006

### **CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system. I caused to be served upon counsel of record, at the address stated below, via the method of service indicated, a true copy of same:

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/s/ Walter H. Porr, Jr.  
Walter H. Porr, Jr.,

Dated: January 26, 2006